

Exhibit O

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF JULIO ROIG, JR.

COMES NOW the declarant, JULIO ROIG, JR., pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001 when the terrorist attacks occurred, I was in my office at M.E.P. Consulting Engineering Company located at 29 Broadway, one block from the World Trade Center. I was informed that the first plane struck Tower One and looked out the window to assess the damage. When I witnessed the second plane striking Tower Two, I realized that it was a terrorist attack.

4. When Tower Two started collapsing, my co-workers and I immediately closed the westerly side windows adjacent to Trinity Street. We sealed the windows and door with wet towels

and shut off the HVAC system in an effort to prevent the infiltration of smoke and dust particles into our office.

5. Approximately an hour after Tower One collapsed, we decided that we needed to leave our office and head to safety. I walked to Battery Park surrounded by debris and a huge grey wall of toxic dirt. A tugboat transported me to Hoboken where I was quarantined and the Fire Department washed me down with a fire hose, treating me as a victim of chemical warfare.

6. Due to the dangerous inhalants within the World Trade Center towers, including both pulverized alkaline dust from fragmented building materials and chemical products from explosions and burning of building materials, I started suffering breathing problems almost immediately.

7. On October 16th, I went to the doctor because I had general body aches, sore throat, coughing, wheezing, and shortness of breath. I was diagnosed with a viral illness and radiographs of my chest demonstrated diffuse miliary nodules throughout my lung fields. In November of 2001, I underwent an invasive surgical procedure where 10% of my right lung was removed in order to determine the cause of my breathing difficulties. Tests revealed large quantities of silicates and the presence of multiple, well-defined pulmonary granuloma and I was diagnosed with the lung disease, granulomatous pneumonitis.

8. Through numerous tests, my physicians were able to exclude common causes of granulomatous pneumonitis such as berylliosis, sarcoidosis, tuberculosis, extrinsic allergic alveolitis due to organic dusts, and other bacterial, fungal, and viral illnesses. They concluded that my illness was most likely caused by the exposure to dust at the World Trade Center, particularly the inhalation of heavy metals that were known to be present based on air-sampling studies in the first 48 hours following the explosion.

9. Prior to the attacks on the World Trade Center, I had no history of asthma, allergies, or any family history of respiratory disorders. I never smoked cigarettes, took no medications and did not have any hobbies involving birds, molds, farming, or construction work, which may have exposed me to toxins. Moreover, I had undergone routine radiographs of the chest, with normal findings, six months before.

10. During the years following the September 11th attacks, my lung capacity diminished to such an extent that I became a candidate for a lung transplant. While my lung capacity has improved during the last couple of years, my lungs are permanently scarred due to this disease. My doctors do not know how the scars will affect my lung function in the future. Attached as Exhibit B to this Declaration is a true and correct copy of my medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.

11. In addition to suffering physical injuries as a result of the September 11th attacks, I also suffered financially. I missed significant amounts of work and my business lost at least eight months of revenue. I was forced to take out a business loan and borrow from my 401(k) plan to make ends meet.

12. September 11, 2001, and its carnage is emblazoned in my memory. In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen. I was surrounded by death, debris, burning, and smoke. The situation could only be compared to a war zone.

13. I previously pursued a claim through the September 11th Victim Compensation Fund specifically related to my injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 14 day of January 2020.

Julio Roig

JULIO ROIG, JR.

Exhibits Filed Under Seal